

MAR 16 2022

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

Clerk, U. S. District Court
Eastern District of Tennessee
At Knoxville

UNITED STATES OF AMERICA

v.

No. 3:22-CR- 20JUDGES Jordan / McCook

MARTEZ S. WILSON,

a/k/a "Scooter,"

a/k/a "Tez,"

JEFFREY L. SCALES,

a/k/a "Blue,"

a/k/a "Dreads,"

DONALD W. MCCRAINEY,

a/k/a "D,"

SHELTON M. MCCRAINEY,

a/k/a "Shells,"

LAUREN S. MANNS,

KEYASIA F. DAVIS,

a/k/a "Key,"

SHARDE R. SIMMON,

a/k/a "Moody,"

MICHELE C. MAXWELL,

SAMUEL B. HARRIS,

a/k/a "Snoop,"

a/k/a "Tip," and

DESHAWN A. HEADE

INDICTMENTCOUNT ONE

The Grand Jury charges that, from on or about July 1, 2020 through on or about March 16, 2022, within the Eastern District of Tennessee and elsewhere, the defendants, MARTEZ S. WILSON, a/k/a "Scooter" and "Tez," JEFFREY L. SCALES, a/k/a "Blue" and "Dreads," DONALD W. MCCRAINEY, a/k/a "D," SHELTON M. MCCRAINEY, a/k/a "Shells," LAUREN S. MANNS, KEYASIA F. DAVIS, a/k/a "Key," [REDACTED], SHARDE R. SIMMON, a/k/a "Moody," MICHELE C. MAXWELL, SAMUEL B. HARRIS, a/k/a "Snoop" and "Tip," and DESHAWN A. HEADE, and other persons known and unknown

to the Grand Jury, did knowingly, intentionally, and without authority combine, conspire, confederate and agree with each other and with diverse others to distribute four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, and one hundred (100) grams or more of a mixture and substance containing a detectable amount of N-(4-fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (p-fluorofentanyl), a Schedule I controlled substance and analogue of fentanyl, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

COUNT TWO

The Grand Jury further charges that on or about February 3, 2021, in the Eastern District of Tennessee, the defendant, MARTEZ S. WILSON, a/k/a “Scooter” and “Tez,” knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms and ammunition, and those firearms and ammunition had been transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

COUNT THREE

The Grand Jury further charges that on or about November 10, 2021, in the Eastern District of Tennessee, the defendants, JEFFREY L. SCALES, a/k/a “Blue” and “Dreads,” KEYASIA F. DAVIS, a/k/a “Key,” [REDACTED] and SHARDE R. SIMMON, a/k/a “Moody,” aided and abetted by each other and others, did knowingly possess with intent to distribute four hundred (400) grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT FOUR

The Grand Jury further charges that on or about November 10, 2021, in the Eastern District of Tennessee, the defendants, JEFFREY L. SCALES, a/k/a “Blue” and “Dreads,” KEYASIA F. DAVIS, a/k/a “Key,” [REDACTED] and SHARDE R. SIMMON, a/k/a “Moody,” aided and abetted by each other and others, did knowingly and unlawfully possess firearms in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to distribute controlled substances as set forth in Counts One and Three of this Indictment, the descriptions of which are fully incorporated herein, in violation of Title 18, United States Code, Sections 924(c)(1)(A) and 2.

COUNT FIVE

The Grand Jury further charges that on or about November 10, 2021, in the Eastern District of Tennessee, the defendant, JEFFREY L. SCALES, a/k/a “Blue” and “Dreads,” knowing that he had previously been convicted of a crime punishable by a term of imprisonment exceeding one year, did knowingly possess firearms and ammunition, and those firearms and ammunition had been transported in interstate commerce, in violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853, Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 and/or 841, as set forth in Counts One and Three of this Indictment, the defendants, MARTEZ S. WILSON, a/k/a "Scooter" and "Tez," JEFFREY L. SCALES, a/k/a "Blue" and "Dreads," DONALD W. MCCRAINEY, a/k/a "D," SHELTON M. MCCRAINEY, a/k/a "Shells," LAUREN S. MANNS, KEYASIA F. DAVIS, a/k/a "Key," [REDACTED] SHARDE R. SIMMON, a/k/a "Moody," MICHELE C. MAXWELL, SAMUEL B. HARRIS, a/k/a "Snoop" and "Tip," and DESHAWN A. HEADE, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such offense and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense, including but not limited to the following:

Money Judgment

Proceeds the defendants, MARTEZ S. WILSON, a/k/a "Scooter" and "Tez," JEFFREY L. SCALES, a/k/a "Blue" and "Dreads," DONALD W. MCCRAINEY, a/k/a "D," SHELTON M. MCCRAINEY, a/k/a "Shells," LAUREN S. MANNS, KEYASIA F. DAVIS, a/k/a "Key," [REDACTED], SHARDE R. SIMMON, a/k/a "Moody," MICHELE C. MAXWELL, SAMUEL B. HARRIS, a/k/a "Snoop" and "Tip," and DESHAWN A. HEADE, personally obtained as a result of the violations of Title 21, United States Code, Sections 841 and/or 846.

Firearms

- a. Ruger, Model P345, .45 caliber handgun seized on February 3, 2021;
- b. Ruger, Model P89DC, 9mm caliber handgun seized on February 3, 2021;

- c. Canik, Model TP9 EliteSC, 9mm caliber handgun seized February 3, 2021;
- d. Smith & Wesson, Model Bodyguard 380, .380 caliber handgun seized February 3, 2021;
- e. FN Herstal, Model Five-seven, 5.7 caliber handgun seized on February 3, 2021;
- f. American Tactical Imports, Model Omni Hybrid, multi-caliber rifle seized on February 3, 2021;
- g. Glock, Model 27, .40 caliber handgun seized on November 10, 2021;
- h. Taurus, Model PT111 G2, 9mm caliber handgun seized on November 10, 2021;
- i. Taurus, Model TH9C, 9mm caliber handgun seized on November 10, 2021;
- j. Anderson Manufacturing, Model AM-15, .223/5.56 caliber rifle seized on November 10, 2021;
- k. Taurus, Model G3, 9mm caliber handgun seized on November 10, 2021;
- l. Glock, Model 43, 9mm caliber handgun seized on November 10, 2021;
- m. Canik, Model TP9SA, 9mm caliber handgun seized on November 10, 2021;
- n. Troy Industries, Model Troy Carbine, multi-caliber rifle seized on November 10, 2021; and
- o. Ammunition.

Upon conviction of an offense in violation of Title 18, United States Code, Sections 922(g)(1) and/or 924(c)(1)(A) as set forth in Counts Two, Four, and Five of this Indictment, the defendants, MARTEZ S. WILSON, a/k/a “Scooter” and “Tez,” JEFFREY L. SCALES, a/k/a “Blue” and “Dreads,” [REDACTED] KEYASIA F. DAVIS, a/k/a “Key,” and SHARDE S. SIMMON, a/k/a “Moody,” shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense.

- a. Ruger, Model P345, .45 caliber handgun seized on February 3, 2021;
- b. Ruger, Model P89DC, 9mm caliber handgun seized on February 3, 2021;
- c. Canik, Model TP9 EliteSC, 9mm caliber handgun seized February 3, 2021;
- d. Smith & Wesson, Model Bodyguard 380, .380 caliber handgun seized February 3, 2021;
- e. FN Herstal, Model Five-seven, 5.7 caliber handgun seized on February 3, 2021;
- f. American Tactical Imports, Model Omni Hybrid, multi-caliber rifle seized on February 3, 2021;
- g. Glock, Model 27, .40 caliber handgun seized on November 10, 2021;
- h. Taurus, Model PT111 G2, 9mm caliber handgun seized on November 10, 2021;
- i. Taurus, Model TH9C, 9mm caliber handgun seized on November 10, 2021;
- j. Anderson Manufacturing, Model AM-15, .223/5.56 caliber rifle seized on November 10, 2021;
- k. Taurus, Model G3, 9mm caliber handgun seized on November 10, 2021;
- l. Glock, Model 43, 9mm caliber handgun seized on November 10, 2021;
- m. Canik, Model TP9SA, 9mm caliber handgun seized on November 10, 2021;
- n. Troy Industries, Model Troy Carbine, multi-caliber rifle seized on November 10, 2021; and
- o. Ammunition.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), defendants shall forfeit substitute property, up to the value of the property subject to forfeiture, if by any act or omission of the defendant, the property, or any portion thereof:

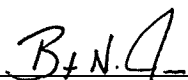
- a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;
c. has been placed beyond the jurisdiction of the court;
d. has been substantially diminished in value; or
e. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:



FRANCIS M. HAMILTON III
UNITED STATES ATTORNEY



BRENT N. JONES
Assistant United States Attorney